

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

D-1 Fredric Haynes

D-2 Jeremy Joshua

Case: 2:21-mj-30594

Assigned To : Unassigned

Assign. Date : 12/21/2021

Case No.

Description: RE: FREDRIC HAYNES,
JEREMY JOSHUA (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 20, 2021 in the county of Eastern in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*21 USC § 841, 846
18 USC § 922(g)(1)*Offense Description*Conspiracy to Possess with Intent to Distribute Controlled Substances
Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit

☐ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: December 21, 2021City and state: Detroit, Michigan*Complainant's signature*Brandon Kushel, Special Agent, DEA*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

AFFIDAVIT MADE IN SUPPORT OF A CRIMINAL COMPLAINT

INTRODUCTION AND BACKGROUND

I, Brandon M. Kushel, having been duly sworn, depose and state as follows:

1. I am a Special Agent, with the Drug Enforcement Administration (DEA) and have experience in the investigation, apprehension and prosecution of individuals involved in federal criminal offenses, the use of cellular devices to commit those offenses and the available technology that can be used by law enforcement to assist in identifying the users of cellular devices and their location. I have served with the DEA since October 17, 2015, and successfully completed the Basic Agent Training Program at the DEA Academy, located in Quantico, Virginia. Prior to serving as a DEA Special Agent, I served as a Deportation Officer with Immigration and Customs Enforcement (ICE), in Detroit, Michigan, from September 2015, to October 2015, and as an Immigration Enforcement Agent with ICE from November 2008 to September 2015. While serving as an Immigration Enforcement Agent with ICE, I served as a Task Force Officer (TFO) on the United States Marshal Service (USMS) Detroit Fugitive Apprehension Team (DFAT) for approximately two and a half years. During the course of my employment, my duties have included writing complaints, search and arrest warrants, preparing Title III

affidavits, participating in the execution of search and arrest warrants, fugitive investigations, collection of evidence, interviewing subjects, and testifying at various court proceedings. In addition, I have extensive experience in Title III investigations and therefore, I am knowledgeable about drug investigations and interpreting the coded language that drug traffickers commonly use, as well as knowledge of the patterns of behavior of individuals involved in drug trafficking organizations, including, but not limited to methods used to smuggle and safeguard, collect, distribute and launder money related to the sale of drugs. My interpretations have been accepted by courts in multiple districts in prior affidavits.

2. There is probable cause to believe Fredric HAYNES and Jeremy JOSHUA have committed violations of Title 21, United States Code, Section 841(a)(1), possession with intent to distribute fentanyl (at least 400 grams) and Title 21, United States Code 846, conspiracy of the aforementioned crime. There is also probable cause to believe that JOSHUA has a prior felony conviction punishable by imprisonment for a term exceeding one year and that he knowingly possessed a firearm, in violation of Title 18, United States Code, Section 922(g)(1).

PROBABLE CAUSE

3. Since approximately March 2020, DEA has been investigating the Fredric HAYNES and Jeremy JOSHUA Drug Trafficking Organization (DTO). JOSHUA and HAYNES conspire together to distribute controlled substances. I have

identified HAYNES as a source of supply for individuals in and around the Detroit area. HAYNES resides in California, where I believe he is obtaining drugs. HAYNES travels to Michigan to meet with JOSHUA in furtherance of their drug trafficking activity.

TARGET SUBJECTS BACKGROUND

HAYNES

4. HAYNES (DOB: XX/XX/1982) has a criminal history from three different states that includes a conviction from 2011 for possession of Schedule I, II, III or IV controlled substance (the arrest indicates trafficking in cocaine), and a 2013 conviction for controlled substance delivery/manufacture (cocaine, heroin or another narcotic) 50-449 grams. He was discharged from parole in February 2019.

JOSHUA

5. JOSHUA (DOB: XX/XX/1988) has a criminal history that includes a June 22, 2011 conviction for possession of marijuana; an April 12, 2012 conviction for controlled substance possession (cocaine, heroin or another narcotic) less than 25 grams; and a January 7, 2014 conviction for felony firearm, carrying a concealed weapon and weapons-firearm-discharge in or at a building.

Seizures Related to the JOSHUA/HAYNES DTO

December 2020 Fentanyl and Cash

6. During one of HAYNES's prior trips to Michigan in December 2020, agents seized drugs and drug proceeds from trap compartments in vehicles HAYNES and JOSHUA dropped off to a car hauler.

8. On December 10, 2020, investigators conducted surveillance of HAYNES and JOSHUA and saw them deliver two vehicles – an Acura and Accord – to a car hauler in the Lakeside mall parking lot. They first delivered the Acura and then the Accord, making two separate trips to drop off each vehicle. Investigators saw HAYNES converse with the car hauler each time. Before each vehicle delivery HAYNES and JOSHUA visited a condominium on Pendleton Circle, Sterling Heights, Michigan and backed the cars out from an attached garage that I believe HAYNES and JOSHUA utilized to conceal both vehicles and the activity of loading the trap compartments in each vehicle.

9. Investigators maintained surveillance after the car hauler departed the mall parking lot hauling both the Acura and Accord HAYNES and JOSHUA delivered. After observing several traffic violations, a Michigan State Police (MSP) marked unit, at the direction of DEA investigators, stopped the car hauler. A properly trained and certified drug detecting K9 alerted to the presence of drugs in both the Acura and Accord. A subsequent search of the Acura revealed a concealed

compartment within the backseat of the vehicle that contained 990 grams of fentanyl and \$140,020. A search of the Honda Accord revealed a hidden compartment in the dashboard of the vehicle that contained \$158,970 (total between both vehicles: \$298,990). With the currency being secreted in hidden compartments and 990 net grams of fentanyl with the currency in the Acura, I believe that the currency was proceeds from the sale of drugs that HAYNES, JOSHUA and potentially others, had distributed.

10. I determined that HAYNES provided one of his known phone numbers as the contact number for the pickup of the vehicles with the name “Damien Hayes,” likely an alias for Fredric HAYNES, provided in an effort to conceal HAYNES’s identity and association with the cars on the car hauler.

HAYNES’s travel to Michigan in December 2021

11. HAYNES was in Michigan again in December 2021 and investigators conducted surveillance of him and JOSHUA. During surveillance on December 16, 2021, investigators observed JOSHUA travel to a single-family residence on Lappin Street. I know from the investigation JOSHUA has been in the process of renovating this residence for an extended period of time. Subpoenaed utility records reveal that JOSHUA maintains utilities in his name at this location.

12. Investigators saw that HAYNES and JOSHUA spent an extended period of time together (approximately 7 hours) at the Lappin residence before

departing at approximately 1:17 a.m. on December 17, 2021 and traveling to JOSHUA's residence, an apartment on Fleetwood Drive, Harper Woods, Michigan (discussed in more detail below).

13. On December 17, 2021, HAYNES and JOSHUA traveled to the Pendleton Circle condominium where they remained for approximately only 15 minutes before traveling to Detroit. While at the Pendleton Circle condominium, investigators were unable to observe HAYNES or JOSHUA take anything into or out of the residence. Their travel there was out of their way, indicating to me that like it was in December 2020, their visit was related to their drug trafficking activity.

14. Also on December 17, 2021, agents saw JOSHUA conduct a suspected drug transaction from the Lappin residence after he and HAYNES visited the Pendleton Circle condominium. Investigators saw JOSHUA travel to the Lappin Street residence. After arriving, JOSHUA met with a male, a suspected drug customer, after the customer arrived in a vehicle. The men went into the Lappin Street residence and neither appeared to have anything in their hands, but the suspected customer departed the residence carrying a brown bag. Although the contents of the bag is unknown, this activity is consistent with that of a drug transaction. I know, based on training and experience, drug traffickers will conceal drugs and/or drug currency in bags, backpacks, duffel bags, or even on their persons

and will not typically blatantly carry a kilogram of drugs, for example, in their hands as they depart a residence after obtaining drugs.

15. On December 19, 2021, investigators again conducted surveillance of HAYNES and JOSHUA. During surveillance, HAYNES and JOSHUA again traveled to the Lappin Street residence, where they remained for approximately 45 minutes before departing. Neither HAYNES nor JOSHUA was observed taking anything into or out of the residence. HAYNES departed Michigan the night of December 19, 2021, arriving in California on or about this same date, eventually returning to his residence in Bakersfield, California.

Execution of Search Warrants in Michigan

16. Investigators executed search warrants on December 20, 2021 after HAYNES departed Michigan and traveled back to Bakersfield, California. The search of these locations resulted in the seizure of approximately 17.216 gross kilograms of suspected fentanyl, an AR-15, a money counter, and an undetermined amount of United States currency.

Lappin Street, Detroit, MI

17. Investigators identified this residence as a location that JOSHUA was in the process of renovating for an extended period of time and that HAYNES and JOSHUA frequented together, including as recently as December 16 and 19, 2021.

18. At this location, investigators located and seized approximately 4.96 gross kilograms of suspected fentanyl. Investigators seized some of the drugs from a vehicle in the garage that is registered in JOSHUA's name. Inside the residence, investigators seized a kilogram press, with approximately 1.45 gross kilograms still in the press. I know presses are used to repackage drugs into a brick like format typically after drug traffickers add dilutants to drugs for further distribution. With the press being located here and some of the drugs no longer being in brick like form, but some being separated into smaller baggies for further distribution, I believe HAYNES and JOSHUA used this location to "cut" drugs in an effort to increase the quantity.

19. Investigators also seized a firearm from a bedroom closet, specifically a DPMS AR-15 rifle, which was not loaded, but had a loaded magazine inserted. I know from training and experience that this firearm is not manufactured in the state of Michigan and therefore the firearm that JOSHUA had in the Lappin Street residence had to have traveled in interstate commerce.

Pendleton Circle, Sterling Heights, MI

20. Investigators identified this condominium that HAYNES and JOSHUA would travel well out of their way frequently only to make short trips, suggesting the importance to their travel to this location. During the search warrant, investigators seized approximately 11.685 gross kilograms of suspected fentanyl

from a duffle bag in a closet. The condominium otherwise appeared unoccupied, suggesting HAYNES and JOSHUA used it exclusively to stash drugs.

21. I believe that HAYNES and JOSHUA transported kilograms between the Pendleton Circle condominium and the Lappin Street residence, where it appears HAYNES and JOSHUA were breaking down and repackaging drugs to be further distributed to another drug trafficker. This would explain the extensive amount of time HAYNES and JOSHUA spent at the Lappin Street residence the night prior their trip to the Pendleton Circle condominium.

Fleetwood Drive, Harper Woods, MI

22. I identified an apartment on Fleetwood Drive as JOSHUA's primary residence. I also know from DEA's investigation that HAYNES regularly stayed here with JOSHUA during his stays in Michigan. JOSHUA was present here in his bedroom when investigators executed the search warrant. When investigators searched this residence, they seized approximately 571 gross grams of suspected fentanyl in the kitchen. In a second bedroom agents found a pill bottle with HAYNES's name and an undetermined amount of United States currency in a drawer under the bed in the same room with HAYNES's pill bottle. The money was rubber banded and in stacks, consistent with drug currency based on my personal experience. Investigators also seized several garage door openers when they

searched Fleetwood. Investigators subsequently confirmed one opened the garage door to the Pendleton Circle condominium.

23. Investigators conducted a field test of the drugs in the kilogram press from the Lappin Street location, which was presumptively positive for the presence of fentanyl. The other drugs seized on December 20, 2021 were not field tested. However, given the 990 grams of fentanyl seized on December 10, 2020 was tested by a DEA laboratory and at least a portion of the seized drugs tested presumptive positive for fentanyl on December 20, 2021, I have a probable cause basis to believe the other seized drugs likely contain fentanyl.

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CONCLUSION

24. I believe probable cause exists that HAYNES and JOSHUA possessed with intent to distribute controlled substances, to wit a mixture and substance containing at least 400 grams of fentanyl, and conspired with one another to do so, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. I also believe that probable cause exists that JOSHUA after having been convicted of a crime punishable by imprisonment for a term exceeding one year (a felony offense), did knowingly possess a firearm, that had previously traveled in interstate commerce, in violation of Title 18, United States Code, 922(g)(1).

Respectfully Submitted,



Brandon Kushel
Special Agent, Drug Enforcement Administration

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable David R. Grand
United States Magistrate Judge

Dated: December 21, 2021